



Lawrence S. Lustberg
Director

Gibbons P.C.
One Gateway Center
Newark, NJ 07102-5310
llustberg@gibbonslaw.com

August 23, 2024

VIA ECF

Honorable Pamela K. Chen, United States District Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. McMahon, et al.*
Docket No. 21-cr-265

Dear Judge Chen,

As Your Honor is aware, this Firm represents Defendant Michael McMahon in the above-captioned matter. I write to respectfully request a brief adjournment of Mr. McMahon's sentencing, which was recently rescheduled for October 10, 2024; this is the first such request that has been made by Mr. McMahon. The reason for it is that I have some pre-planned (and pre-paid) travel scheduled for October 1 through October 10 and would, therefore, request that a date convenient for the Court and the Government be set after that; if possible, a date on or after October 21, 2024 would be best, since my colleague Ms. Conti will be on her honeymoon from October 11 through 20, but, of course, we defer to Your Honor's schedule.

We have consulted with the Government (by Meredith Arfa, Assistant U.S. Attorney), which has very graciously consented to this request, but asks that the Court schedule the sentencing for as soon after October 21 as feasible. That said, of course, if the Court has any questions or concerns, please do not hesitate to contact us. We apologize for any inconvenience and thank Your Honor for your kind consideration of this request.

Respectfully submitted,

s/ Lawrence S. Lustberg
Lawrence S. Lustberg

cc: All counsel of record (via ECF)